

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 24-60114-CR-Singh A1

UNITED STATES OF AMERICA

vs.

BETSCY KURIAN,

Defendant.

AGREED FACTUAL BASIS FOR GUILTY PLEA

Betscy Kurian (hereinafter referred to as the "Defendant" or "Kurian") hereby acknowledges that, if this case were to go to trial, the United States would establish the following facts beyond a reasonable doubt:

From in or around November 2020 and continuing through in or around October 2023, in Broward County, in the Southern District of Florida, and elsewhere, the Defendant did knowingly and willfully combine, conspire, and agree with others to dispense without authorization of law and distribute a controlled substance, including Oxycodone, in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(C).

Chans Pharmacy Plus, Inc. ("Chans") was a pill mill pharmacy located in Pembroke Pines, Florida, in the Southern District of Florida. Kurian, a licensed pharmacist, was the pharmacist in charge of Chans and managed its day-to-day dispensing and sales.

As a licensed pharmacist, Kurian was aware of numerous red flags of drug and opioid diversion that pharmacies must monitor and resolve prior to dispensing controlled substances. These red flags included, among others, the following: (1) factory-like prescribing, with multiple patients getting the same drug, dosage, and quantity; (2) large numbers of cash-paying customers;

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(3) individuals other than the patient picking up prescriptions on behalf of multiple other patients; (4) patients traveling long distances within South Florida to fill their prescriptions; and (5) patients receiving prescriptions for the same high dose of opioids for an extended period of time. Kurian mentioned the presence of these red flags to her co-conspirator, the owner of Chans, who instructed Kurian to continue to dispense the medication despite these numerous red flags.

From approximately November 2020 to October 2023, despite the presence of all of these red flags in prescriptions brought to Chans, Kurian and her co-conspirators dispensed and distributed large volumes of Schedule II controlled substances, the vast majority of which were tablets of Oxycodone Hydrochloride 30mg ("Oxycodone 30mg"). For example, during this period, one customer routinely visited Chans to fill prescriptions for several individuals for large quantities of Oxycodone 30mg, paying approximately \$800 in cash per bottle of Oxycodone 30mg. This individual paid in cash each time. Kurian and her co-conspirators dispensed and distributed 3,845 tablets of Oxycodone 30mg to this individual while knowing that these prescriptions were written outside the course of professional practice and not written for a legitimate medical purpose.

The preceding statement is a summary, made for the purpose of providing the Court a factual basis for my guilty plea to the charges against me. It does not include all of the facts known to me concerning the criminal activity in which I and others engaged. I make this statement knowingly and voluntarily and because I am in fact guilty of the crimes charged.

GLENN S. LEON  
CHIEF, FRAUD SECTION

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

Date: 10/15/24  
Initials: Ble

By: Jacqueline Derb...  
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JACQUELINE Z. DEROVANESIAN  
TRIAL ATTORNEY  
CRIMINAL DIVISION, FRAUD SECTION

Date: 06/12/24

By: Betscy Kurian

BETSCY KURIAN  
DEFENDANT

Date: 06/12/2024

By: Jude Faccidomo

JUDE FACCIDOMO, ESQ.  
COUNSEL FOR DEFENDANT

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